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*MARIO PIATELLI, JACK G. FROST,*  
17 *JACK GIBSON FROST, INC., J.D. HUNT,*  
*HUNT BROS. PRODUCING CO., INC. and*  
18 *ROBERT DIERKING*

19 UNITED STATES DISTRICT COURT  
20 DISTRICT OF NEVADA -- RENO  
21

23 THE PIATELLI COMPANY, INC., a California	)	Case No.: 3:12-cv-00225-RCJ-WGC
corporation; MARIO PIATELLI, an individual;	)	
24 JACK G. FROST, an individual; JACK GIBSON	)	
FROST, INC., a California corporation; J.D.	)	<b>PRELIMINARY INJUNCTION</b>
25 HUNT, an individual; HUNT BROS.	)	
PRODUCING CO., INC., an Oklahoma	)	Complaint Filed: April 23, 2012
26 corporation; and ROBERT DIERKING, an	)	
individual	)	
27	)	
28 Plaintiffs,	)	

1 vs.

2 ALAN CHAMBERS, an individual; LAURA  
3 CHAMBERS, an individual, and DOES 1 through  
4 10,

5 Defendants.  
6

7  
8 Plaintiffs THE PIATELLI COMPANY, INC; MARIO PIATELLI; JACK G. FROST JACK  
9 GIBSON FROST, INC; J.D. HUNT; HUNT BROS. PRODUCING CO., INC; and ROBERT  
10 DIERKING (hereinafter collectively "Plaintiffs") having filed their complaint for a temporary  
11 restraining order, preliminary injunction, and permanent injunction and other relief in this matter, and  
12 having applied with notice for a temporary restraining order pursuant to Rule 65 of the Federal Rules  
13 of Civil Procedure, and the Court having considered the complaint, Plaintiffs' brief, declarations,  
14 exhibits, and other materials filed in support thereof, and the parties having been heard by the Court at  
15 a hearing on May 3, 2012, and now being advised in the premises, and the parties agreeing hereto,  
16 finds as follows:

17 1. Complete diversity of the parties exists and this Court has jurisdiction of the subject  
18 matter of this case and of the parties. The Complaint states a claim upon which relief may be granted.

19 2. Good cause exists to believe that Plaintiffs will ultimately succeed in establishing that  
20 the above named Defendants have engaged in, and are likely to continue to engage in, the wrongful  
21 acts alleged in the Complaint and Plaintiffs are likely to prevail on the merits.

22 3. Good cause exists to believe that Plaintiffs will suffer immediate and irreparable injury,  
23 loss, or damage unless Defendants are immediately restrained and enjoined in the manner set forth  
24 below. This irreparable injury, loss, or damage, includes the impairment of their relationship with The  
25 Yasheng Group and the potential loss of a one-of-a-kind sale opportunity.

26 4. Weighing the equities and considering Plaintiffs' likelihood of ultimate success, a  
27 Preliminary Injunction is in the public interest.  
28

For purposes of this Preliminary Injunction, the following definitions shall apply:

1. **“Defendants”** means ALAN CHAMBERS, LAURA CHAMBERS, and each of them, by whatever names each may be known, as well as their successors, assigns, agents, servants, employees, salespersons, attorneys and those persons or entities in active concert or participation with them who receive actual notice of this Preliminary Injunction by personal service, facsimile, e-mail, publication, or otherwise, whether acting directly or through any corporation, subsidiary, division or other devise.

2. **“Lucky Boy LLC”** means Lucky Boy Mining and Development, LLC, a Nevada limited liability company.

3. **“Operating Agreement”** means the March 8, 2007 Lucky Boy Mining and Development, LLC Operating Agreement.

4. **“Plaintiffs”** means THE PIATELLI COMPANY, INC; MARIO PIATELLI; JACK G. FROST, JACK GIBSON FROST, INC; J.D. HUNT; HUNT BROS. PRODUCING CO., INC; and ROBERT DIERKING.

5. **“Prohibited Acts”** means:

- a. entering the Subject Property at any time from fourteen (14) days after the date and time of this Preliminary Injunction through any period that The Yasheng Group has a contractual right to: (1) conduct its due diligence relating to the Subject Property; (2) exercise an option to lease the Subject Property; (3) the lease term if The Yasheng Group exercises such option; and (4) any time during which The Yasheng Group has a contractual right to purchase the Subject Property; and
- b. taking any actions which might interfere with the any contract between Lucky Boy LLC and The Yasheng Group, including, but not limited to: (1) directly or indirectly contacting The Yasheng Group, its directors, officers, managers,

employees, agents, professional consultants, shareholders, or representatives in person, by telephone, by e-mail, by text message, by facsimile, or in any other manner; (2) making any defamatory statements about the Lucky Boy LLC, the Plaintiffs, or The Yasheng Group; or (3) purporting to take any actions on behalf of Lucky Boy LLC without first complying with the requirements of Lucky Boy LLC's Operating Agreement.

6. **"Subject Property"** means that certain 800+/- acre real property, including a mine, located in Mineral County, Nevada that is identified by Assessor's Parcel Numbers 06-420-27 and 06-420-30 and more particularly described as:

PARCEL 1

Township 7 North, Range 29 East, M.D.B. & M.

Section 25: The West Half (W1/2) of the Southwest Quarter (SW1/4)

Section 26: All

Excepting therefrom the North Half (N1/2) of the Northwest Quarter (NW1/4)

PARCEL 2

Township 7 North, Range 29 East, M.D.B. & M.

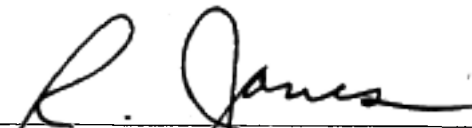
Section 27: Southeast Quarter (SE1/4)

7. **"THE YASHENG GROUP"** means The Yasheng Group, Inc., a California corporation and its directors, officers, managers, employees, agents, shareholders, or representatives.

**PRELIMINARY INJUNCTION**

**IT IS THEREFORE ORDERED** that, Defendants, and each of them are immediately restrained and enjoined from engaging in any of the Prohibited Acts. This Preliminary Injunction is issued May 3, 2012 and shall remain in effect during the pendency of this matter.

DATED: May 3, 2012

  
The Honorable Robert C. Jones  
United States District Judge